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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHELLE Y. HOOPER, an individual;
TIMOTHY W. HOOPER, an individual,

Plaintiffs,

v.

SPECIALIZED LOAN SERVICING, LLC, a
foreign limited-liability company,

Defendant.

Case No.: 2:18-cv-00542-APG-CWH

**STIPULATION AND [PROPOSED]
ORDER TO (1) VACATE CLERK'S
ENTRY OF DEFAULT; (2)
WITHDRAW PLAINTIFFS' MOTION
FOR DEFAULT JUDGMENT; AND (3)
EXTEND THE TIME FOR
DEFENDANT TO ANSWER**

Plaintiffs Michelle Y. Hooper and Timothy W. Hooper ("Plaintiffs"), by and through their counsel of record, The Law Office of Kevin L. Hernandez, and Defendant Specialized Loan Servicing, LLC, ("SLS"), by and through its counsel of record, Greenberg Traurig, LLP, stipulate and request that the Court: (1) vacate the Clerk's entry of default (ECF No. 9); (2) withdraw Plaintiffs' Motion for Default Judgment (ECF No. 10); and (3) extend the time by which SLS must respond to the Complaint by fourteen (14) days. This Stipulation is made and based upon the following:

1. Plaintiffs filed their Complaint on March 26, 2018, in which they allege SLS violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et. seq.* ECF No. 1.
2. An Amended Summons was issued on April 3, 2018. ECF No. 6.
3. The Amended Summons was returned executed on April 13, 2018. ECF No. 7. The Amended Summons was served on National Registered Agents, Inc., in Carson City, Nevada. *Id.*

4. National Registered Agents, Inc., is not SLS' registered agent. Rather, SLS' registered agent with the Nevada Secretary of State is the United Agent Group, Inc., located in Las Vegas, Nevada. Thus, SLS was not served with the Summons and Complaint.
5. Plaintiffs moved for a Clerk's entry of default on June 12, 2018 (ECF No. 8) which was granted the following day (ECF No. 9).
6. Plaintiffs thereafter filed a Motion for Default Judgment on July 5, 2018. (ECF No. 10). That Motion remains pending.
7. SLS has recently become aware of this lawsuit and has retained the undersigned counsel to defend it.
8. In light of the foregoing, the parties stipulate and request that the Court vacate the Clerk's entry of default (ECF No. 9).
9. The parties further stipulate that Plaintiffs' Motion for Default Judgment (ECF No. 10) is withdrawn.
10. Finally, the parties agree that SLS shall have fourteen (14) days from the date of entry of this Order in which to respond to the Complaint.
11. This is the first request for the relief contained herein. This Stipulation is entered into in good faith and not for purposes of delay.

DATED this 24th day of July, 2018.

DATED this 24th day of July, 2018.

/s/ Jason Hicks
JACOB D. BUNDICK, ESQ.
JASON HICKS, ESQ.
Attorneys for Defendant

/s/ Kevin Hernandez
KEVIN L. HERNANDEZ, ESQ.
Attorneys for Plaintiffs

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 25, 2018